

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

ZURU INC. and ZURU (SINGAPORE)
PTE LTD.,

Plaintiffs,

vs.

THE INDIVIDUALS,
CORPORATIONS, LIMITED
LIABILITY COMPANIES,
PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE A
HERETO,

Defendants.

Case No. CV 20-00395 JMS-KJM

**DECLARATION OF
GLENN T. MELCHINGER**

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I, Glenn T. Melchinger, hereby declare as follows:

1. I am an attorney with the law firm of Dentons US LLP, attorneys for Plaintiffs Zuru Inc. and Zuru (Singapore) PTE Ltd. (collectively "Plaintiffs") in this action.

2. I make this Declaration based on my personal knowledge and am competent to testify as to the matters set forth herein. This Declaration is made in support of *Plaintiffs' Ex Parte Motion to Temporarily Seal Certain Information in Plaintiffs' Motion for Temporary Restraining Order and Other Relief* ("Ex Parte Motion").


3. Pursuant to L.R. 5.2 and Federal Rules of Civil Procedure Rule 5.2, Plaintiff is filing documents in this case with certain redactions to help preserve the status quo, given the Defendant Internet Stores access to Chinese websites that scrape court websites, such as sellerdefense.cn.

4. Sellerdefense.cn is not accessible to me because China (".cn" domains) are blocked on my firm's network and is, I believe, not likely a secure site (*e.g.*, it may cause monitoring software, or malicious tools to download). I did obtain certain screen shots translated to English from our consultant Ms. Arnaiz at my request which I understand were accessed from China, two of which are included below (highlights added). Notably, the site calls out specific law firm actions, changes in techniques, identifies specific products, and warns stores about having funds frozen (*e.g.*, "if you can withdraw cash, please act quickly") when orders are applied. The existence of such sites and chatrooms (*see* ECF 20 at nn. 2 & 3) and the URL "sellerdefense" itself strongly suggest counterfeit manufacturers actively engage in evasive maneuvers to avoid the effect of U.S. enforcement actions. My understanding of the "lists" mentioned in the screenshots below are that they are defendant online store listings similar to the Schedule A that Plaintiffs seek to seal in this *Ex Parte* Motion.



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The list of Nendoroid and Magic Tracks cases has been released, please check!

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Keener adds new agency brand-What Do You Meme card

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Keener Law Firm changes the "rules of the game"? Take precautions!!!

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HAMANN released its first case this year! Attached is a summary of already agent car brands!


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SellerDefense WeChat Official Account



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THE SECOND CASE OF LAZY MOP SUED ALIEXPRESS AND ALI INTERNATIONAL STATION! KEENER REPRESENTS THE NEW BAND, THE FREEZE BEGINS! (THERE IS A LIST)

Home / EPS / Lazy mop

Post Views: 527


Last week, the lazy mop Baseboard Buddy, which was given an urgent notice to everyone, issued a new case. There is no seller feedback to freeze. The second case is mainly for the seller accounts of AliExpress and Ali International Station.

In addition, the bait law firm Keener also represented the band's new brand Blackberry Smoke: **The freeze has begun. If you can withdraw cash, please act quickly!**

Baseboard Buddy Lazy Mop

Case No.: 20-cv-9072
Time of Prosecution: 2020/10/29
Plaintiff Company: ALLSTAR MARKETING GROUP, LLC
Acting Law Firm: EPS
Place of Prosecution: New York, USA

Trademark + image copyright, the first case 20-cv-9073 prosecuted all Wish accounts, and in addition to fines, the store operation was suspended. This new case is aimed at AliExpress and Ali International Station.




Baseboard Buddy Simply Glide And Dust Extendable Microfiber Cleaner Washes

US \$8.19 ~~US \$9.99~~ -18%

US \$1.00 off on US \$18.00 Get coupons

SellerDefense WeChat Official Account



U.S. law firm case settlement agent

5. Contemporaneously filed herein, and submitted by email for the Court's *in camera* review, and concurrently lodged with the Court along with this *Ex Parte* Motion, are (1) Plaintiffs' *Ex Parte* Motion for Entry of Temporary Restraining Order, Temporary Transfer of Defendant Domains, Temporary Asset Restraint, Expedited Discovery, and Electronic Service of Process/Publication, (2) Schedule A to the Complaint, and (3) Exhibit 1 to the Declaration of Jessica Arnaiz, which contain information identifying the Defendant counterfeiters/trademark infringers.

6. The caption for this case has also been framed so as not to list any of the Defendants Internet Stores, but to include them in Schedule A to be sealed.

7. Plaintiffs also note that the Defendant Internet Stores are not actual entity or party names, but rather are monikers used for the Defendants' online presence on various internet marketplaces such as Ebay, Amazon, Wish, etc.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Honolulu, Hawai'i, on November 22, 2020.

/s/ Glenn T. Melchinger
GLENN T. MELCHINGER